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14 *Attorneys for Defendant, CITY OF LOS ANGELES*

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 JANET GARCIA, GLADYS ZEPEDA,
14 MIRIAM ZAMORA, ALI EL-BEY, PETER
15 DIOCSO JR., MARQUIS ASHLEY, JAMES
16 HAUGABROOK, individuals, KTown FOR
17 ALL, an unincorporated association,
18 ASSOCIATION FOR RESPONSIBLE and
19 EQUITABLE PUBLIC SPENDING an
unincorporated association,

20 *Plaintiffs,*

21 vs.

22 CITY OF LOS ANGELES, a municipal entity;
DOES 1-50,

23 *Defendant(s).*

Case No.: 2:19-cv-6182-DSF-PLA
Assigned to Judge Dale S. Fischer

**DECLARATION OF GABRIEL S.
DERMER IN SUPPORT
DEFENDANT CITY OF LOS
ANGELES' OBJECTION TO
NEW EVIDENCE SUBMITTED
WITH PLAINTIFFS' REPLY ISO
MOTION FOR PRELIMINARY
INJUNCTION**

Date: April 6, 2020
Time: 1:30 p.m.
Ctym: 7D
Judge: Hon. Dale S. Fischer

Complaint Filed: July 18, 2019

DECLARATION OF GABRIEL S. DERMER

I, GABRIEL S. DERMER, hereby declare:

1. I am an attorney at law, duly licensed to practice before this Court and all of the courts of the State of California. I am one of the attorneys for Defendant City of Los Angeles ("City") in this action. I make all statements herein of my own personal knowledge, and if called to testify as a witness in this action, I could and would testify competently to the truth of the matters set forth herein.

2. Attached as **Exhibit A** is a true and correct copy of an email that Shayla Myers sent to me and other individuals on March 16, 2020.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed on March 30, 2020 at Los Angeles, California.


GABRIEL S. DERMER

EXHIBIT A



Gabriel Dermer <gabriel.dermer@lacity.org>

Garcia v. City of LA-request for extension

Shayla R. Myers <SMyers@lafla.org>

Mon, Mar 16, 2020 at 11:00 AM

To: Gabriel Dermer <gabriel.dermer@lacity.org>, Scott Marcus <Scott.Marcus@lacity.org>, Patricia Ursea <patricia.ursea@lacity.org>, Felix Lebron <felix.lebron@lacity.org>

Cc: Benjamin Herbert <benjamin.herbert@kirkland.com>, "Onufer, Michael" <michael.onufer@kirkland.com>, Catherine Sweetser <catherine.sdshhh@gmail.com>

Counsel,

Plaintiffs' reply brief is currently due today. In light of the requests from the City this weekend to limit exposure in order to help prevent the spread of COVID-19, our firms have all now instituted various closures and mandatory work from home requirements, which unexpectedly went into effect today. Along with the various other closures, including school closings, etc., this is proving to be incredibly disruptive and severely limiting our resources, as we are working to implement these changes and still continue to provide services. At the Legal Aid Foundation of Los Angeles, this includes making significant accommodations and adjustments to be able to continue to provide emergency legal assistance to our low-income clients, whose needs unfortunately often increase when there are emergencies like this one.

In light of the disruptions caused by the emergency precautions, we request the City agree to a brief extension of time for Plaintiffs to file our reply brief. The Court's standing order requires an extension of the hearing date to accommodate any extension of the timing of the reply brief, so we propose simply continuing the hearing date by a week. This will not only accommodate additional time to file the reply brief, in light of the emergency closures, but will also continue the hearing date past the two week isolation period set by the City and most other agencies.

If you are amenable to the continuance, please let us know and we will file a stipulation to be filed as soon as possible. If you would like to discuss this or any other issue, I can be reached on my cell, 310-447-8607.

Thanks in advance for your professional courtesy.

Shayla

Shayla Myers | Senior Attorney

Legal Aid Foundation of Los Angeles

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